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Attorneys for Defendant
Onesimo Danilo Cholula Gonzalez

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**ONESIMO DANILO CHOLULA
GONZALEZ,**

Defendant.

Case No.: 24-MJ-71769

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE HEARING**

Mr. Gonzalez is set for a status hearing before this Court on December 16, 2025 at 10:30 a.m. The parties agree that a continuance of the status conference is needed to allow for production and review. The government has produced a very large volume of discovery, including for events across many months and extensive wiretap evidence. There are also voluminous financial records, reaching many hundreds of pages, that require redaction by the government.

The parties thus stipulate and request that the Court re-set this matter for January 22, 2026.

Thus, the parties stipulate to the following:

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- 1) The defendant excludes time of all applicable time periods under the Speedy Trial Act from December 16, 2025, through January 22, 2026.
- 2) The parties further agree that time should be excluded in order to provide reasonable time necessary for effective preparation of counsel, pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv).
- 3) The parties further stipulate and agree that the ends of justice served by excluding the time from December 16, 2025 through January 22, 2026, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).
- 4) The parties further stipulate that, with the consent of the defendant, there is good cause for extending the time limits for a preliminary hearing under Federal Rule of Criminal Procedure 5.1. See Fed. R. Crim. P. 5.1(d).

Counsel for Mr. Gonzalez certify that they obtained approval from government counsel to file this stipulation and proposed order.

SO STIPULATED.

DATED: December 11, 2025

CRAIG MISSAKIAN

United States Attorney

/s/

KENNETH CHAMBERS

Assistant United States Attorney

/s/

SHAFFY MOEEL

MOEEL LAH FAKHOURY LLP

Attorneys for Mr. Gonzalez

[PROPOSED] ORDER

Accordingly, and for good cause shown, THE COURT ORDERS THAT:

Based on the reasons provided in the stipulation of the parties above, and for good cause shown, the Court orders that Mr. Gonzalez's status hearing be re-set to January 21, 2026 at 10:30 a.m.

The Court further finds good cause to exclude all applicable time periods under the Speedy Trial Act from December 16, 2025, through January 21, 2026.

The Court finds that there is good cause for extending the time limits for a preliminary hearing under Federal Rule of Criminal Procedure 5.1. See Fed. R. Crim. P. 5.1(d).

The Court further finds that failure to exclude time would unreasonably deny the defendant and his counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

Thus, the Court finds that the ends of justice served by excluding the time from December 16, 2025 through January 21, 2026, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED:

HON. THOMAS S. HIXSON
UNITED STATES MAGISTRATE JUDGE